

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

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<b>IN RE:</b>	)	
	)	<b>MDL NO. 2753</b>
	)	
<b>ATRIUM MEDICAL CORP. C-QUR MESH</b>	)	
<b>PRODUCTS LIABILITY LITIGATION</b>	)	<b>MDL Docket No.</b>
	)	<b>1:16-md-02753-LM</b>
	)	<b>ALL CASES</b>
	)	

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**PLAINTIFFS' AND DEFENDANTS' JOINT AGENDA FOR  
THE STATUS CONFERENCE SCHEDULED FOR JULY 13, 2017**

Now come the parties in the above entitled multidistrict litigation and jointly submit the following agenda items, along with a brief description of the items at issue, in preparation for the July 13, 2017 Status Conference:

**AGENDA**

1. **ESI Protocol:** Following the successful in-person meet and confer to discuss the terms of an ESI Protocol, the parties have been negotiating the final language of the ESI Protocol and currently remain in that process. The parties hope to finalize the ESI Protocol by the July 12, 2017 filing deadline and prior to the July 13, 2017 Status Conference. If the parties have not reached a consensus, counsel for the parties will inform the Case Manager of the need for a discussion on this topic and a very brief extension of the July 12, 2017 filing deadline.
2. **Plaintiff Profile Form (PPF), Plaintiff Fact Sheet (PFS), Defendant Profile Form (DPF), Defendant Fact Sheet (DFS), and Joint Collection Order, as well as the Enabling Orders for these documents:** The parties are negotiating revisions to the PPF, PFS, DPF, DFS, Joint Collection Order, and the Enabling Order, which will govern these

documents. The parties are optimistic that agreement on these documents will be reached by the July 12, 2017 filing deadline and prior to the July 13, 2017 Status Conference. If the parties have not reached a consensus, counsel for the parties will inform the Case Manager of the need for a discussion on this topic and a very brief extension of the July 12, 2017 filing deadline.

### **3. Update of the NH State Court Litigation**

Dated: July 6, 2017

Respectfully submitted,

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